

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

SHARKNINJA OPERATING LLC and
SHARKNINJA SALES COMPANY,

*Plaintiffs and
Counterclaim-Defendants,*

v.

DYSON, INC. and DYSON TECHNOLOGY
LIMITED,

*Defendants and
Counterclaim-Plaintiffs.*

C.A. No. 1:23-cv-11277-ADB

JURY TRIAL DEMANDED

THE PARTIES' REVISED PROPOSED SCHEDULE

Pursuant to Rule 16.6 of the Local Civil Rules for the District of Massachusetts, and this Court's Order (ECF No. 8) and instruction during the Parties' July 10, 2023, Initial Scheduling Conference, Plaintiffs and Counterclaim-Defendants SharkNinja Operating LLC and SharkNinja Sales Company (collectively, "Plaintiffs" or "SharkNinja") and Defendants and Counterclaim-Plaintiffs Dyson, Inc. and Dyson Technology Limited ("Dyson") (collectively, the "Parties"), by and through their undersigned counsel, submit the following revised proposed schedule:

Event	Proposed Date
Initial Scheduling Conference	On or about Monday, July 10, 2023, at the Court's convenience
Exchange of Rule 26(a)(1) Initial Disclosures	Friday, July 14, 2023
Parties Submit Proposed Protective Order	Friday, July 21, 2023
Parties Submit Proposed ESI Discovery Protocol	Friday, July 21, 2023
Deadline for Patentee's Preliminary Patent-Related Disclosures Pursuant to Local Rule 16.6(d)(1)	Friday, July 28, 2023
Deadline for Conference Concerning Preliminary Patent Disclosures Pursuant to Local Rule 16.6(d)(2)	Monday, August 14, 2023

Event	Proposed Date
Deadline for Accused Infringer's Preliminary Production of Technical Documents, Source Code, and Samples of Accused Products Pursuant to Local Rule 16.6(d)(4)	Monday, August 28, 2023
Deadline for Simultaneous Exchange of Claim Terms to Be Construed and Their Proposed Claim Constructions Pursuant to Local Rule 16.6(e)(1)(A)	Monday, September 18, 2023
Deadline for Conference Concerning Claim Construction Pursuant to Local Rule 16.6(e)(1)(B)	Monday, September 25, 2023
Deadline for Joint Statement of the Number of Claims and Terms to be Construed and Their Proposed Constructions Pursuant to Local Rule 16.6(e)(1)(D)	Friday, September 29, 2023
Deadline for Simultaneous Exchange of Opening Claim Construction Briefs pursuant to Local Rule 16.6(e)(2)	Tuesday, October 17, 2023
Deadline for Simultaneous Exchange of Responsive Claim Construction Briefs pursuant to Local Rule 16.6(e)(4)	Tuesday, December 5, 2023
Deadline for Amending Pleadings and Joinder of Additional Parties Without Leave of Court	Friday, December 22, 2023
Deadline to Submit Tutorials, if any, to the Court pursuant to Local Rule 16.6(e)(6)	Thursday, January 25, 2024 (14 days before claim construction hearing)
Claim Construction Hearing	Tuesday, February 13, 2024, at 10:00am ET
Substantial Completion of Document Production	Friday, February 23, 2024
Fact Discovery Closes	Friday, June 7, 2024
Deadline to Serve Opening Expert Reports on Issues Where the Party Bears the Burden of Proof	Tuesday, July 2, 2024
Deadline to Serve Rebuttal Expert Reports on Issues Where the Party Does Not Bear the Burden of Proof	Wednesday, July 31, 2024
Expert Discovery Closes	Friday, August 23, 2024
Deadline for Filing Dispositive Motions (including <i>Daubert</i>)	Wednesday, October 2, 2024
Deadline for Response to Dispositive Motions	Thursday, October 24, 2024
Deadline for Replies re: Dispositive Motions	Tuesday, November 12, 2024

Event	Proposed Date
Pretrial Conference	To be determined by the Court, approximately 17 months after the Initial Scheduling Conference, at the Court's convenience
Trial	To be determined by the Court, approximately 18 months after the Initial Scheduling Conference, at the Court's convenience

Dated: July 18, 2023

Respectfully submitted,

/s/ Joseph J. Mueller

Joseph J. Mueller

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CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on July 18, 2023.

/s/ Michael Strapp